



Randy Fiorini, Chair

Delta Stewardship Council

May 27, 2017

Re: **DELTA PLAN AMENDMENTS FOR CONVEYANCE, STORAGE SYSTEMS, AND THE OPERATION OF BOTH**

Dear Randy:

These are the comments of the Natural Heritage Institute on the proposed amendments to the Delta Plan dealing with Conveyance, Storage Systems, and the operation of both.

We applaud the Council for addressing this difficult, important and controversial question. We endorse the proposed amendments. The construction and operation of storage systems upstream of the Delta, and the construction and operation of Delta conveyance systems have the potential to greatly affect water supply, Delta ecology and the people who live in and near the Delta, and those who rely on the Delta for their water and ecosystem services.

We urge the Council to take even greater cognizance of the inevitability of sea level rise, and the ever increasing projections of sea level rise along the coast of California. While a small rise in sea level (perhaps a foot) might be accommodated by increasing levee height and size, a virtually inevitable rise of five to 10 feet in this century will almost certainly overwhelm the levees of substantially subsided islands unless those islands are immediately converted to biomass production, so they can “keep up” with sea level rise.

Sea level rise means that the effectiveness of future and existing storage upstream of the Delta in improving water supply south of the Delta will depend entirely on new ability to convey water through the Delta in a new facility. Dual conveyance will prove useful at least as long as there are not several Delta islands permanently inundated. Even after that, there will be times when there is sufficient fresh water in the Delta to allow the use of a dual conveyance system, pumping water from the South Delta, as well as from a North Delta intake.

We offer the following specific comments on the proposed Delta plan amendments. We look forward to reviewing the Ecosystem amendments when they become available. Our comments begin on page 21 of the proposed amendments.

Conveyance

1. 1.A.1.c.

“Dual conveyance requires continued maintenance and further improvement of through-Delta conveyance. Through-Delta conveyance improvements may include channel improvements consistent with the Delta Plan and additional facilities that could provide for improved operations for native fish protection.”

We agree, but this should not be an open ended commitment to maintain levees, unless the landowners agree to change land use management practices that stop and reverse subsidence. Also, the landowner obligation to maintain the levees should be increased, and the state’s overall obligation should be limited.

2. 1.B.1.c.

“The potential effects of climate change on the conveyance alternatives under consideration, including possible precipitation and runoff pattern changes and sea level rise estimates consistent with guidance provided by the California Natural Resources Agency, National Research Council, or other appropriate projections.”

The Ocean Protection Council should be added to the list of agencies providing guidance. This should be done every time a list of agencies is cited.

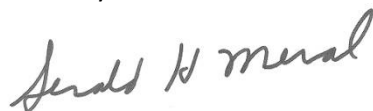
3. 1.C.1 Add the following:

e. take into account expected levels of sea level rise, including projections at the upper range of maximum sea level rise.

We suggest adding a section recommending that agencies proposing storage or conveyance projects consider how storage projects would work with or without conveyance, and under conditions of climate change and sea level rise.

Thank you for considering our comments.

Sincerely

A handwritten signature in dark ink, appearing to read "Gerald H. Meral". The signature is fluid and cursive, with the first name "Gerald" and last name "Meral" clearly distinguishable.

Gerald H. Meral, Ph.D.

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